

HEATHER E. WILLIAMS, #122664
Federal Defender
RACHELLE BARBOUR, #185395
Assistant Federal Defender
Office of the Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
916-498-5700
Rachelle.Barbour@fd.org

Attorney for Defendant
JOSHUA DAVID PRICE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:24-cr-121-WBS
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
v.)	CONTINUE STATUS CONFERENCE AND
)	EXCLUDE TIME
JOSHUA DAVID PRICE,)	
)	New Date: April 7, 2025
Defendant.)	Time: 10:00 a.m.
)	Judge: Hon. William B. Shubb
)	

IT IS HEREBY STIPULATED by and between the parties through their respective counsel, ROGER YANG, Assistant United States Attorney, attorney for Plaintiff, and RACHELLE BARBOUR, attorney for Defendant, JOSHUA DAVID PRICE, that the Status Conference set for Monday, January 27, 2025, at 10:00 a.m., be continued to **Monday, April 7, 2025, at 10:00 a.m.** and that time be excluded for the reasons set forth below.

Defense Counsel has received significant discovery that is subject to a protective order and must be reviewed personally with Mr. Price and cannot be left with him at the jail. Investigation is ongoing. Defense Counsel has been reviewing and analyzing the discovery, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case

1 with her client and the Government, and continue to prepare. The Government has recently
 2 provided video evidence that must be reviewed. The Government has indicated that it may seek
 3 a superseding indictment regarding acts requiring significant additional discovery to be provided
 4 to the Defense.

5 The parties believe that failure to grant the requested continuance would deny defense
 6 counsel the reasonable time necessary for effective preparation, taking into account the exercise
 7 of due diligence. Accordingly, the parties stipulate and request that the Court exclude time
 8 between the date of the filing of this stipulation through the new status conference date of April
 9 7, 2025 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the
 10 ends of justice served by continuing the case as requested outweigh the interest of the public and
 11 the defendant in a trial within the original date prescribed by the Speedy Trial Act.

12 Dated: January 17, 2025

Respectfully submitted

13 HEATHER E. WILLIAMS
 14 Federal Public Defender

15 /s/ Rachelle Barbour
 16 RACHELLE BARBOUR
 17 Assistant Federal Defender
 Attorneys for Defendant
 JOSHUA DAVID PRICE

18 Dated: January 17, 2025


MICHELE BECKWITH
 Acting United States Attorney

20 /s/ Roger Yang
 21 ROGER YANG
 Assistant United States Attorney
 Attorney for Plaintiff

23 **ORDER**

24 The Court hereby adopts the new Status Conference date and excludes time for the
 25 reasons set forth above under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

26 Dated: January 17, 2025

27 
 28 WILLIAM B. SHUBB
 UNITED STATES DISTRICT JUDGE